

# Exhibit 1



Andrew Tate <atate@ndhlawyers.com>

## Riggleman - Second subpoena to VDOC

5 messages

Andrew Tate <atate@ndhlawyers.com>

Tue, Apr 24, 2018 at 12:49 PM

To: "McNelis III, Edward J." <EMcNelis@sandsanderson.com>, "Muldowney, Elizabeth M."

<EMuldowney@sandsanderson.com>

Cc: mwilliams <mwilliams@ndhlawyers.com>

Bcc: 9sbbdf50@mg.casefleet.com

Ed and Liz, quick question: Will you accept service of a second VDOC subpoena on VDOC's behalf?

### Andrew R. Tate, Esq.

ASSOCIATE ATTORNEY

NEXUS DERECHOS HUMANOS

Attorneys for Civil and Human Rights

The Historic Grant Building, Suite 200

44 Broad Street Northwest

Atlanta, Georgia 30303

o/ 404.254.0442 | f/ 703.997.6427

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Andrew Tate <atate@ndhlawyers.com>

Tue, Apr 24, 2018 at 5:46 PM

To: "McNelis III, Edward J." <EMcNelis@sandsanderson.com>, "Muldowney, Elizabeth M."

<EMuldowney@sandsanderson.com>

Cc: mwilliams <mwilliams@ndhlawyers.com>, Tina Sheridan <tsheridan@ndhlawyers.com>, Michele Dobbs

<mdbobs@ndhlawyers.com>

Bcc: 9sbbdf50@mg.casefleet.com

Ed and Liz, I've attached the second subpoena to VDOC. Please let me know if you will accept service of this subpoena on VDOC's behalf.

Best,  
Andrew

**Andrew R. Tate, Esq.**

ASSOCIATE ATTORNEY

**NEXUS DERECHOS HUMANOS**

**Attorneys for Civil and Human Rights**

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**2018.04.24 Second Subpoena to VDOC.pdf**  
19091K

**McNelis III, Edward J.** <[EMcNelis@sandsanderson.com](mailto:EMcNelis@sandsanderson.com)>

Tue, Apr 24, 2018 at 5:52 PM

To: Andrew Tate <[atate@ndhlawyers.com](mailto:atate@ndhlawyers.com)>, "Muldowney, Elizabeth M." <[EMuldowney@sandsanderson.com](mailto:EMuldowney@sandsanderson.com)>

Cc: mwilliams <[mwilliams@ndhlawyers.com](mailto:mwilliams@ndhlawyers.com)>, Tina Sheridan <[tsheridan@ndhlawyers.com](mailto:tsheridan@ndhlawyers.com)>, Michele Dobbs

<[mdobbs@ndhlawyers.com](mailto:mdobbs@ndhlawyers.com)>

We have both been out of the office all day tied up and unable to check email. I have about 300 emails to read when I get to my hotel in Chesapeake Virginia this evening. We have to check with our folks before excepting any subpoenas. I'm driving and dictating this so excuse grammar and typos

Edward J. McNelis, III

Attorney

Sands Anderson PC

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**From:** Andrew Tate <[atate@ndhlawyers.com](mailto:atate@ndhlawyers.com)>



**Date:** Tuesday, Apr 24, 2018, 5:47 PM

**To:** McNelis III, Edward J. <EMcNelis@sandsanderson.com>, Muldowney, Elizabeth M.

<EMuldowney@sandsanderson.com>

**Cc:** mwilliams <mwilliams@ndhlawyers.com>, Tina Sheridan <ts Sheridan@ndhlawyers.com>, Michele Dobbs <mdobbs@ndhlawyers.com>

**Subject:** Re: Rigglesman - Second subpoena to VDOC

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**Andrew Tate** <atate@ndhlawyers.com>

Tue, Apr 24, 2018 at 6:05 PM

To: "McNelis III, Edward J." <EMcNelis@sandsanderson.com>

Cc: "Muldowney, Elizabeth M." <EMuldowney@sandsanderson.com>, mwilliams <mwilliams@ndhlawyers.com>, Tina Sheridan <ts Sheridan@ndhlawyers.com>, Michele Dobbs <mdobbs@ndhlawyers.com>

No problem, Ed. Please drive safely and just let me know as soon as you can. I look forward to our call tomorrow with Diane and everyone.

**Andrew R. Tate, Esq.**

ASSOCIATE ATTORNEY

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**Andrew Tate** <atate@ndhlawyers.com>

Wed, May 2, 2018 at 10:18 AM

To: "McNelis III, Edward J." <EMcNelis@sandsanderson.com>

Cc: "Muldowney, Elizabeth M." <EMuldowney@sandsanderson.com>, mwilliams <mwilliams@ndhlawyers.com>, Tina Sheridan <ts Sheridan@ndhlawyers.com>, Michele Dobbs <mdobbs@ndhlawyers.com>

Ed and Liz, please let me know if you will accept service of the third party subpoena to VDOC I sent you on April 24.

We can continue to address emails in another conversation.

**Andrew R. Tate, Esq.**

ASSOCIATE ATTORNEY

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